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Ser. No. 09/941,884

6

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REMARKS/ARGUMENTS

Reconsideration of the application is respectfully requested in view of the foregoing amendments and the following discussion.

The previously indicated allowability of Claims 2 and 11 has been withdrawn by the Examiner.

Claims Rejections - 35 USC 103

Claims 2-5 and 11-14 have been rejected as allegedly being unpatentable over Arquilevich et al. (6,137,592, "Arquilevich") in view of Dunand (6398334).

Claims 7 and 16 have been rejected as allegedly being unpatentable over Arquilevich in view of Dunand and Maeda.

Claim 2 has been amended without prejudice to include the features of Claim 3 (canceled), and Claim 11 has been amended without prejudice to include the features of Claim 12 (canceled).

These rejections are respectfully traversed on the grounds that a prima facie case of obviousness has not been established, and the applied references do not teach or suggest the subject matter of the rejected claims.

Arquilevich is drawn to a method for adjusting drive roller linefeed distance. "A difference in feed roller diameter from one printer to another causes a media to advance by a different amount for a given rotation of a drive shaft to which the feed roller is coupled. Such variation in advance distance is a linefeed error. Mean linefeed error is determined and corrected by printing a test plot having several areas. Each area is formed of the same image pattern, but is printed at a different linefeed error adjustment to compensate for mean linefeed error. The different adjustments are prescribed and span a typical compensation range for a given print engine model. The different adjustment factors cause banding to occur in some areas. The user picks one of the test pattern areas which has the

Ser. No. 09/941,884

7

60003206-1

highest print quality (i.e., least or no banding). The linefeed adjustment factor corresponding to such area is used for normal printing." (Abstract)

The Examiner asserts at page 2 of the office action that Arquilevich discloses "printing different areas of a diagnostic pattern at different passes of one or more ink-jet printheads with a controlled amount of media advances between the passes between the printing of the different areas, wherein said different areas are nominally aligned along a horizontal line (Referring to claims 3, 12) (FIG. 5 and columns 6, lines 35-45)" Applicants respectfully disagree. FIG. 5 of Arquilevich discloses several test plots, each printed with a different linefeed error adjustment. However, none of the plots show "printing different areas of a diagnostic pattern at different passes of one or more ink-jet printheads with a controlled amount of media advances between the passes between the printing of the different areas, wherein said different areas are nominally aligned along a horizontal line." Nor does the Examiner point out how FIG. 5 shows a method as recited in Claims 3 and 11, wherein the different areas are nominally aligned along a horizontal line.

Dunand is cited for allegedly disclosing a process of printing, but not for disclosing the subject matter of Claims 2 and 11, including the feature of "printing different areas of a diagnostic pattern at different passes of one or more ink-jet printheads with a controlled amount of media advances between the passes between the printing of the different areas, wherein said different areas are nominally aligned along a horizontal line."

In view of these differences between the claimed subject matter and the disclosure of the cited references, a prima facie case of obviousness of Claims 2 and 11 has not been established.

The rejections of the dependent claims which depend from Claims 2 and 11 should also be withdrawn.

Claims 7 and 16 have been rejected as allegedly being unpatentable over Arquilevich in view of Dunand and Maeda.

Ser. No. 09/941,884

8

60003206-1

Maeda is cited as allegedly showing printing different areas of a diagnostic plot. Applicants respectfully disagree with the recitation of the alleged teachings of Maeda. The embodiment illustrated in FIGS. 7-10 of Maeda is directed to the problem of an ink drawing phenomenon causing bleeding, resulting from laying down a dot right next to a just previously deposited dot. By depositing respective dots in a checkerboard fashion, the ink drawing phenomenon is said to be avoided. FIGS. 10A-10D show the technique of checkerboard printing using respective mask patterns. See, Maeda at 10:35 to 11:54.

The passages of Maeda cited by the Examiner do not pertain to a "diagnostic plot," or a "diagnostic multi-pass print mode mask," but rather to techniques of printing to avoid bleed during normal print operations.

Because Arquilevich and Dunand admittedly do not show the features of Claims 7 and 16, and because Maeda does not supply the missing teachings of these claims, a *prima facie* case of obviousness has not been established. Applicants respectfully submit that the combination of references to form the grounds for the rejection is the product of improper hindsight reconstruction.

The Examiner further states that it would have been obvious to include the applying of a diagnostic multi-pass print mode mask as allegedly disclosed by Maeda into the advance control process as disclosed by Arquilevich, as modified, and that the motivation for doing so is to reduce the formed bind pitch to less than paper transport width without increasing the number of scans, so that banding artifacts are imperceptible as taught by Maeda at 4:4-10. The problem addressed by Maeda has nothing to do with the problem of media advance errors, and so the motivation asserted by the Examiner would not lead one to the solution set out in Claims 7 and 16.

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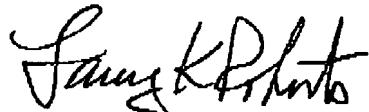
9

60003206-1

CONCLUSION

The outstanding rejections should be withdrawn. A prima facie case of obviousness has not been established. Applicants respectfully submit that the application should be allowed.

Respectfully submitted,



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